



ALFRED POLIZZOTTO (1935-2001)
ALFRED POLIZZOTTO III*

EMILIO RODRIGUEZ

*(ADMITTED NEW YORK, NEW JERSEY)

LONG ISLAND OFFICE
1129 Northern Boulevard, Ste 404
Manhasset, New York 11030

VIA ELECTRONIC FILING

April 25, 2024

The Honorable Gabriel W. Gorenstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Request for extension of discovery
Tyler Erdman v. Adam Victor, et al., No. 20 Civ. 4162

Dear Judge Gorenstein,

This letter is written to request an extension of the discovery deadline, presently set for April 18, 2024, and for an extension of the deadline for the order required in the case management plan, presently set for April 25, 2024.

Paragraph 1.E of the Court's Individual Rules and Practices states requests for extensions of deadlines must state (1) the date or dates sought to be extended, (2) the number of previous requests for extensions, (3) the reason for the extension, and (4) whether the adversary objects and, if so, the reasons given by the adversary for objecting.

This is the fourteenth request for an extension of the discovery deadline. The extension is needed so the Plaintiff can complete his review of the documents provided to him. After discussing it with him, Plaintiff informed me he consents to the request of the extension of the discovery deadline.

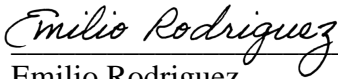
PLEASE RESPOND TO BROOKLYN OFFICE

During the conference held with the Court on April 17, 2024, the only issue that was not discussed concerned the extension of discovery. Both we and the Plaintiff discussed the issue of an extension following the conference but there was confusion as to who would be drafting the actual letter.

This letter proposes a change of the discovery deadline from April 18, 2024, to July 18, 2024, to comply with the latest directives issued by the Court, among them the more definite statement and the submissions currently due from both parties on May 1, 2024. All parties are diligently working to comply with those directives. On our part, we are gathering the information required by the Court regarding all sources of document production and how they were compiled. This extension, in turn, affects the deadline for the order required by the case management plan, presently set for April 25, 2024. We propose changing it to July 25, 2024.

Therefore, Plaintiff and I make this joint request to extend the deadlines for discovery and the order required in the case management plan.

Yours faithfully
Polizzotto & Polizzotto, LLC


Emilio Rodriguez


Alfred Polizzotto III